

United State of America

9-20-2023

Page 1

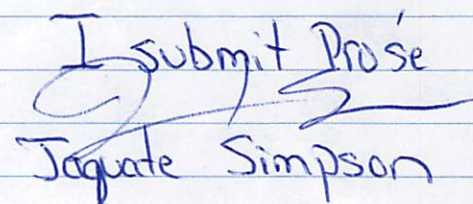
Defendant Jaquate Simpson moves Pro'se requesting this court to grant new counsel for sentencing. Our attorney client relationship has ended. Mr. Robert Wagner openly admitted that he stopped communication with me since he was not hired for my direct appeal, I have that email available. Mr. Wagner did not counsel as to why my points or arguments were not included in some motions filed on my behalf; for example the most recent motion to expedite Robert failed to respond directly to the government because he knew I was left in the blind as to any discussions regarding a date for sentencing. I wasn't even aware of my last hearing date on Aug. 25, 2023. Mr. Wagner fails to respond in a timely manner and multiple communications are sent through my family and friends in order to get a response from him. He refused to file recusal motion after Dec. 5, 2022 Franks hearing, because he said he was loyal to the courts. Mr. Wagner was not prepared for trial which courts even mentioned in trial; for example on the 5th day of trial Tuesday March 7, 2023, Mr. Wagner had just realized he didn't have transcripts of one of Ms. Farland interviews which was a major part of my case. Mr. Wagner admits he just had went over it the weekend of trial, the courts exposes him saying Robert was celebrating his wife's birthday weekend of trial. We can't communicate he did not even follow up on courts with providing power points that was presented in trial, clerk said on record at the last hearing on 8-25-2023 she would get it to us. I know it will be extremely difficult to get any of my discovery from him due to him never showing it to me, because he couldn't locate information from the government dumping discovery on him a certain way.

9-20-2023

Page 2

I've been wanting Mark Stokes off my case as records will show, due to him having no experience on a case like this. I only agreed to keep him because it took 9 months for me to get another lead counsel. It's law for a defendant to have 2 counsels in a capital case, I communicated with none for 9 months. I also didn't want anymore intentional delays. I thought at very least Mr. Stokes could catch a retired lawyer at the time up to speed. I was wrong, he did nothing. I've only seen him 2 to 3 times while Mr. Wagner was my counsel. Mr. Stokes couldn't even get my clothes from trial to my family. He also made false statements on record at my Aug 25, 2022 motion to compel hearing, saying I was being shown my discovery on the computer in the attorney panel. Both counsels have been ineffective and did a horrible job in trial. Mr. Wagner said he held back because he wanted arguments on appeal, and did not want government to fix paperwork to cover their tracks. I do not trust either counsel on making the correct objections in my sentencing. State and federal courts have kept me in lower courts purposely over 6 years not wanting it in appeal courts hands.

In closing defendant begs courts to assign new counsel for sentencing

I submit Prose

Jaquate Simpson